

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 1:09-cv-10555-RBC

STEPHANIE CATANZARO,)
Plaintiff,)
)
v.)
)
EXPERIAN INFORMATION SOLUTIONS, INC. and)
VERIZON NEW ENGLAND, INC.,)
Defendants.)
)

**STIPULATION OF THE PARTIES WITH RESPECT TO JOINT MOTION OF
DEFENDANTS, VERIZON NEW ENGLAND, INC. AND EXPERIAN
INFORMATION SOLUTIONS, INC., TO CONSOLIDATE, PURSUANT TO
FED. R. CIV. P. 42(a)**

NOW COME the plaintiff, Stephanie Catanzaro and the defendants, Experian Information Solutions, Inc. ("Experian") and Verizon New England, Inc. ("Verizon"), and stipulate as follows:

1. The defendants previously moved to consolidate this case for all purposes with the pending case of Stephanie Catanzaro v. Trans Union, LLC and Verizon New England, Inc., Civil Action No. 09-10556-WGY.¹ On October 6, 2009, this court (Collings, J.) issued a Procedural Order, proposing that the joint motion to consolidate be allowed, with the stipulation that the court would reserve a decision on consolidated trials until after discovery had closed and all rulings on dispositive motions had been issued.

¹ The defendants' Joint Motion to Consolidate was filed in this court, as required by Local Rule 40.1(J), because the present case was the first one filed. However, the defendants sought consolidation of the two cases in Judge William G. Young's session.

2. On October 16, 2009, Verizon filed a Brief Statement of Objection to the court's Procedural Order, on the ground that Verizon has separate pending Motions to Dismiss in both cases.² A hearing on the Joint Motion to Consolidate is scheduled for October 19, 2009.

3. The parties hereby stipulate and agree that the two cases are consolidated, including with respect to Verizon's pending Motions to Dismiss, and that any decision regarding the Motions to Dismiss, and whether the cases will be consolidated for trial or tried separately, will be made by Judge Young.

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² A hearing on Verizon's Motion to Dismiss in the case of Stephanie Catanzaro v. Trans Union, LLC and Verizon New England, Inc., Civil Action No. 09-10556-WGY, is scheduled in Judge Young's session on October 21, 2009.

CERTIFICATE OF SERVICE

I, James R. Dyer, hereby certify that on this 19th day of October 2009, I served a copy of this document electronically through the EFC system to the registered participants on the Notice of Electronic filing (NEF):

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